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## UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF OREGON

## PORTLAND DIVISION

DALLAS BUYERS CLUB, LLC,

Plaintiff,

Case No.: **3:15-cv-0907-AC** 

v.

STIPULATED MOTION TO EXTEND TIME AND TO MODIFY PROTECTIVE ORDER

JOHN HUSZAR

Defendants.

## JOINT STIPULATED MOTION TO EXTEND TIME AND TO MODIFY THE PROTECTIVE ORDER

The parties stipulate as follows:

- 1. The parties have stipulated to extend the time for briefing on Defendant's cross-motion for summary judgment, and move the Court to alter the previous briefing schedule as follows:
  - a. Defendant will file his Motion for Summary Judgment on 2/28/2018;
  - Plaintiff will file its Opposition to Defendant's Motion for Summary Judgment on 03/14/2018; and
  - c. Defendant will file his reply on the Motion for Summary Judgment on 03/21/2018.
- 2. The Software Protective Order at Docket 116, paragraph 4 should be modified as follows:
  For those portions of the Excipio and Maverickeye software/source code that are not open source, only the disclosed specific experts, all counsel of record for the parties, and their staff, shall have access to that portion of the code. The limitations of parties with access shall be strictly construed.

Respectively submitted,

/s/ Kiren Rockenstein Attorney for Defendant

/s/ John Mansfield Attorney for Plaintiff